

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GATEGUARD, INC.,

Plaintiff,

-against-

AMAZON.COM, INC.,
AMAZON.COM SERVICES, INC.,
AMAZON.COM SERVICES, LLC,
AMAZON LOGISTICS, INC.,
RING LLC

Defendants.
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No. 21 Civ. 9321 (JGK) (VF)

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, to Deny Class Certification, and to Strike Class Allegations, dated October 1, 2024, and the accompanying declaration of David Salant, dated October 1, 2024, together with the exhibits thereto, Defendants Amazon.com, Inc., Amazon.com Services LLC,¹ Amazon Logistics, Inc., and Ring LLC, by and through their undersigned counsel, move this Court before the Honorable John G. Koeltl, United States District Judge, in Courtroom 14A of the Daniel Patrick Moynihan Courthouse, 500 Pearl St., New York, NY 10007, on a date and time to be determined by the Court, to dismiss with prejudice Counts VI, VII, and XI of Plaintiff's Second Amended Complaint, ECF No. 223, to deny class certification, and to strike Plaintiff's class allegations.

¹ Defendant Amazon.com Services, Inc. no longer exists and is now known as Amazon.com Services LLC.

Pursuant to this Court's scheduling order, ECF No. 234, Plaintiff's opposition is due on **October 31, 2024**, and Defendants' reply is due on **November 14, 2024**.

Dated: October 1, 2024
New York, New York

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Anne Champion

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